



666 Broadway, 7th Floor
New York, New York 10012
212-614-6464
ccrjustice.org

January 16, 2018

VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *Floyd v. City of New York*, 08 Civ. 1034
Davis v. City of New York, 10 Civ. 699
Ligon v. City of New York, 12 Civ. 2274**

Dear Judge Torres:

On behalf of Plaintiffs in the above-entitled actions, we write to request that *Floyd*, *Davis*, and *Ligon* Plaintiffs be given until next Tuesday, January 22, 2019, to notify the Court and Independent Monitor whether we intend to file a response to Defendant City of New York's proposal to implement the Court-appointed Facilitator's Joint Remedial Process Reform Recommendation # 1. *Floyd* Dkt # 681, *Davis* Dkt #444. The Court's November 21, 2018 Order specified that Plaintiffs, who did not see or have any input into the development of the City's proposal prior to its submission to the Court, would have the opportunity to comment on the proposal once it was filed with the Court. *See Floyd* Dkt # 666. Plaintiffs received the City's proposal on Monday afternoon, January 14, and the three Plaintiff teams are currently in the process of reviewing and digesting the proposal and plan to speak to each other later this week to determine whether we will need to file a response. We have informed the Independent Monitor of our request for a January 22 deadline to notify him whether we will file a response, and he has indicated that he has no objection to our request.

Plaintiffs further request that we be given until Monday, January 28, 2019, to file a response to the City's proposal. This time frame is consistent with the time frame for filing objections the Monitor's final recommendations for implementation of Court-ordered reforms set forth in the Court's February 3, 2015 Order. *See Floyd* Dkt # 476.

Thank you for your time and consideration.

Respectfully submitted,

\s\ Darius Charney
Darius Charney
CENTER FOR CONSTITUTIONAL
RIGHTS

Counsel for Floyd Plaintiffs

\s\ Jin Hee Lee

Jin Hee Lee
NAACP-LDF

Counsel for Davis Plaintiffs

\s\ Jenn Rolnick Borchetta

Jenn Rolnick Borchetta
THE BRONX DEFENDERS

Counsel for Ligon Plaintiffs

cc: Peter Zimroth (via ECF)
Counsel for all Parties (via ECF)